

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

In re: \_\_\_\_\_ :  
           Marcia Samuel : Bankr. No. 16-11833-PMM  
           Debtor. : \_\_\_\_\_

## AMENDED MOTION TO MODIFY THE CHAPTER 13 PLAN

1. The captioned debtor hereby requests that the plan be modified pursuant to 11 U.S.C. § 1329(a) so as to add arrears and attorney's fees.
2. Due to the COVID-19 pandemic, the Debtor's domestic partner was unable to work as a gig worker and also as a DJ due to the cancellation of all his scheduled events and he did not qualify for regular unemployment. As a result, the burden of maintaining the household is dependent solely on the Debtor.
2. The proposed modified plan providing for the circumstances above is attached as Exhibit A.
3. The Debtor submits that the modified plan is in the best interests of their reorganization and request this Court's approval of the same

August 26, 2020

## ILLION LAW

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*or the Debtor*